



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

September 27, 1999

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: COMMENTS - PSP FOR THE PREDESIGN SAMPLING IN THE A2P2 - PART TWO AND THREE

Dear Mr. Reising:

Ohio EPA has reviewed DOE's July 6, 1999 submittal on the "Project Specific Plan for Predesign Sampling in the Area 2, Phase II - Part Two and Three". Attached are Ohio EPA's comments on the document.

If you have any questions, please contact me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.

Ohio EPA Comments on the PSP for Predesign Sampling in the A2P2 - Part Two & Three

1.) Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:

Comment: A figure should be included within the PSP documenting the location of all cultural resources within the study area. Additional detail should be provided regarding procedures for sampling within these areas.

2.) Commenting Organization: OEPA Commentor: OFFO
Section #: 1.1 Pg. #: 1-1 Line #:22-23 Code: C
Original Comment #:

Comment: Visual documentation of non-native debris within the soil is basis for excavation as well. The bullet should be clarified to state that debris must be removed and is sufficient basis for additional excavation.

3.) Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-2 Line #: 1-2 Code: C
Original Comment #:

Comment: The areas which aerial photos have shown disturbances in the past are not shown on any map. Are there any samples in these locations? Please provide more details.

4.) Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-2 Line #: 19-25 Code: C
Original Comment #:

Comment: Ohio EPA believes that it is appropriate to sample for all the primary radionuclide contaminants of concern. Sampling for all these parameters is necessary to bound the areas of potential excavation.

5.) Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2 Pg. #: 1-2 Line #: Code: C
Original Comment #:

Comment: The area used to evaluate existing data should be expanded to include samples from adjacent areas. Of particular importance would be along Paddys Run upstream and the Pilot Plant drainage ditch area. These data may provide information relevant to appropriate sampling parameters.

6.) Commenting Organization: OEPA Commentor: OFFO
Section #:2.2 Pg. #:2-1 Line #: Code: C
Original Comment #:

Comment: Section 2.2 is somewhat unclear as to the exact sampling strategy to be used for A2P2 Part Two "eastern segment." In addition, in Figure 2-1 there is only one proposed

boring location, A2P2-PT2-16 and Figure 2-2 shows that about one-third of this area being inaccessible by the RMS scan. Please clarify how DOE will be investigating this area.

7.) Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 1-1 Pg. #: Line #: Code: C
Original Comment #:

Comment: Ohio EPA has heard that OU4 is considering additional use of the former gravel pad within A2P2. Please clarify the status of the use of this area and how it may affect the PSP.

8.) Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 1-1 Pg. #: Line #: Code: C
Original Comment #:

Comment: It is unclear from the drawing the exact boundaries of the investigation area. This is particularly important in areas associated with Paddys Run and the Pilot Plant Drainage Ditch. Please clarify.

9.) Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 1-1 Pg. #: Line #: Code: C
Original Comment #:

Comment: Under which investigation/remediation area will the current construction trailer area for SWU get addressed?

10.) Commenting Organization: OEPA Commentor: OFFO
Section #: Figure 1-2 Pg. #: Line #: Code: C
Original Comment #:

Comment: Why is the study area smaller than the A2P2 boundary? The PSP should provide additional discussion regarding the area actually addressed by the document and associated sampling.

11.) Commenting Organization: OEPA Commentor: OFFO
Section #: 2.0 Pg. #: Line #: Code: C
Original Comment #:

Comment: In order to locate areas of past disposal, DOE should consider the use of magnetometer or ground penetrating radar. These technologies may be useful in evaluating fill areas. An additional technique that could be considered would be exploratory trenches.

12.) Commenting Organization: OEPA Commentor: OFFO
Section #: 2.2 Pg. #: 2-1 Line #: 25-26 Code: C
Original Comment #:

Comment: No justification is provided for the six foot criteria. Ohio EPA believes that areas with less fill than six feet require some level of investigation to ensure that excavation is not necessary. The PSP should be revised. Additionally, a figure should be included to show areas of fill.

13) Commenting Organization: OEPA

Commentor: OFFO

Section #: Figure 2-2

Pg. #:

Line #:

Code: C

Original Comment #:

Comment: Ohio EPA was has the understanding that the brush piles will be removed from the area around the met tower to allow for real time scan. Is this figure consistent with our understanding? If so what are the factors preventing real time scan?

14) Commenting Organization: OEPA

Commentor: OFFO

Section #: 3.0

Pg. #: 3-1

Line #: 3 - 14

Code: C

Original Comment #:

Comment: Due to the unknown disposal history in the areas proposed for sampling, Ohio EPA believes it is appropriate for all samples to be analyzed for all primary radionuclide contaminants of concern. Ohio EPA does not believe the primary radionuclide contaminant list should be reduced, especially in areas of unknown disposal activity.

15) Commenting Organization: OEPA

Commentor: OFFO

Section #: 5.2

Pg. #:5-1

Line #:17-22 Code: C

Original Comment #:

Comment: Please note that Ohio EPA must be notified and approval given of any changes or variances due to conditions in the field.